

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**UNITED STATES OF AMERICA)
)
v.) Case No.: 2:06-cr-169-WKW
)
KOWOSKY TYWAN CHRISTIAN, et al.)**

**DEFENDANT CHRISTIAN'S MOTION TO EXTEND TIME
FOR FILING OF PRE-TRIAL MOTIONS**

COMES NOW the defendant, Kowosky Tywan Christian, through undersigned counsel, Joseph P. Van Heest, and moves this Court for an extension of time to file pre-trial motions, and as grounds for the motion, states the following:

1. The defendant's pre-trial motions are currently due on or before March 29, 2007.
2. Trial is currently set to begin on June 4, 2007.
3. There are sixteen defendants in the above-styled cause, and thirty counts. While defendant Christian is only charged in two of the counts, one of those counts is the conspiracy which includes all defendants. Undersigned counsel will need time to review and digest the more than seven thousand pages of discovery, as well as the numerous other media provided by the government.
4. Undersigned has contacted the government and the government does not oppose the granting of such an extension.

WHEREFORE, premises considered, Defendant Christian prays that this Honorable Court will grant this motion and extend the deadline for filing Defendant Christian's pretrial

motions.

Dated this 20th day of March, 2007.

Respectfully submitted,

s/Joseph P. Van Heest
JOSEPH P. VAN HEEST
LAW OFFICE OF JOSEPH P. VAN HEEST, LLC
Post Office Box 4026
402 South Decatur Street
Montgomery, AL 36103-4026
Phone: (334) 263-3551
Fax: (334) 263-3227
jpvanheestcourts@bellsouth.net
AL Bar Code: VAN026

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: A. Clark Morris, Esq., Assistant U. S. Attorney, One Court Square, Suite 201, Montgomery, Alabama 36104.

Respectfully submitted,

s/Joseph P. Van Heest
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